

## **INTERIM PLAN FOR PREVENTION OF CONTAMINANT DISPERSION**

### **1 OBJECTIVE**

The objective of this Interim Plan for Prevention of Contaminant Dispersion (IPPCD) is to establish procedural requirements to mitigate potential hazards, on an interim basis, to persons located offsite as a result of contact with emissions resulting from intrusive remedial investigation activities.

### **2 SCOPE**

Procedural requirements identified herein are applicable to certain intrusive actions taken at the 16 Operable Units (OUs) as part of the RFI/RI activities described in the Interagency Agreement (IAG). Intrusive activities which fall within the scope of this IPPCD are those with the potential for producing appreciable quantities of suspended particulate, primarily through mechanical actions. Intrusive activities potentially susceptible to producing appreciable quantities of suspended particulate include:

- Monitoring well and soil/rock borehole installation
- Excavations such as trenching and test-pitting using powered equipment

Additionally, heavy vehicular traffic associated with intrusive RFI/RI activities shall be considered susceptible to producing appreciable quantities of suspended particulate. By contrast, activities such as surface soil sampling with hand implements are not considered susceptible to producing appreciable quantities of suspended particulate.

Procedural requirements identified herein must be evaluated on a case-by-case basis to determine their potential impact on other IAG objectives. For example, it is possible that applying certain dispersion techniques, such as wetting, could compromise sample integrity and limit the usefulness of the data for which the sampling was intended.

The procedural requirements identified in the IPPCD shall remain in effect until the final PPCD is approved or until modifications are substantiated, approved, and documented in the Site Specific Health and Safety Plan (SSH&SP).

### **3 RESPONSIBILITY**

The EG&G RFI/RI Project Manager (PM) shall be responsible for assuring that activities conducted at his/her OU are performed in accordance with the requirements identified herein.

The Remedial Projects Division (RPD) Manager will be responsible for follow-up and auditing the PM.

**ADMIN RECORD**

A-SW-000108

#### 4 PROCEDURAL REQUIREMENTS

A pre-startup activity review shall be conducted by the PM and the Activity Field Supervisor to evaluate the potential for particulate emissions to create hazardous conditions. If the activity is being performed by non-EG&G personnel, the subcontractor's Activity Field Supervisor shall participate in the review.

The pre-startup activity review involving intrusive activities where there is a significant potential for producing appreciable quantities of suspended particulate shall be documented by completion of a Radiological/H&S Work Permit (HSP 6.05) and an Excavation Permit (HSP 6.01). HSP's 6.05 and 6.01 are attached.

If the review establishes that there is a significant potential for producing appreciable quantities of suspended particulates that could create hazardous conditions, the specific procedural requirements identified below shall govern the activity.

##### 4.1 SPECIFIC REQUIREMENTS

Activities where there is a significant potential for producing appreciable quantities of suspended particulates shall not be conducted when the following conditions exist:

- Sustained wind speeds above 15 miles per hour (mph) as measured by a site-located anemometer. Sustained winds above 15 mph exist when the 15-minute average wind-speed exceeds 15 mph for two consecutive 15-minute periods.
- Soil moisture content less than 15% in areas where major excavation or scraping is planned as measured with a Soiltest "Speedy Moisture Tester" or an equivalent instrument.
- In the special case of excavations, the top 6" of soil will be moved (i.e., scraped) and placed in a low pile and covered with a tarp or other suitable covering to prevent resuspension of particulates. The width of the scraped zone shall be wide enough to accommodate the expected volume of soil from the excavation, without coming into contact with unexcavated adjacent surface soil.

Air quality monitoring requirements for activities where there is a significant potential for producing appreciable quantities of suspended particulate include the following:

- Site perimeter and community Radiological Ambient Air Monitoring Program (RAAMP) monitoring.
- Local monitoring of Respirable Suspended Particulate (RSP) at individual activity worksites shall be conducted using a TSI "Piezobalance" Model 3500 Respirable Aerosol Mass Monitor, real-time instrument. Local RSP measurements will be used to guide the PM's evaluation of the potential hazards associated with activity related emissions. The threshold RSP concentration for curtailing intrusive activities will be 6.0 milligrams/cubic meter (mg/m<sup>3</sup>).

- Additional worker health and safety monitoring as required by the SSH&SP.

Additional requirements that govern activities where there is a significant potential for producing appreciable quantities of suspended particulates that could create hazardous conditions include the following:

- Excavated soils that are not promptly backfilled shall be covered with a tarp or similar cover to prevent resuspension of particulates.
- Vehicular traffic will be minimized to the extent practicable.
- Vehicular traffic shall not exceed 5 mph.
- Roadways will be watered as necessary.
- Access paths leading to activity sites that are not on roadways will be watered to prevent the generation of particulates from vehicular traffic during access and egress.

Activity specific requirements will be evaluated periodically to determine their effectiveness at preventing dispersion of contaminants. Modifications to these requirements will be documented in the SSH&SP.